

FILED

NOV 12 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID MCKNIGHT,

Defendant.

No.

1:24CR160SNLJ-ACL

INDICTMENT

GENERAL ALLEGATIONS

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The Missouri State Highway Patrol ("MSHP") was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the MSHP was responsible for responding to and investigating crimes occurring in Missouri;
3. Defendant DAVID MCKNIGHT was employed by the MSHP as a law enforcement officer;
4. Defendant DAVID MCKNIGHT was sworn to uphold the United States Constitution, as well as the laws of the State of Missouri.

COUNT ONE
[18 U.S.C. §1519]

5. Paragraphs 1-4 are incorporated here.

6. On or between September 1, 2023 and August 19, 2024, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly concealed and covered up a record with the intent to impede, obstruct, and influence the investigation and proper administration of that matter. Specifically, the defendant deleted one or more images he had acquired unlawfully during the course of his employment. Specifically, after having photographed with his personal cell phone one or more images from the personal cell phones of one or more victims depicting nudity or sexual acts, deleted or attempted to delete those images from his cell phone.

In violation of and punishable under Title 18, United States Code, Section 1519.

COUNT TWO
[18 U.S.C. §242]

7. Paragraphs 1-4 are incorporated here.
8. On or about July 30, 2024, at approximately 6:30 p.m., within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 1 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 1's cell phone under the auspices of confirming Confidential Victim 1's insurance coverage, searched through Confidential Victim 1's cell phone contents without a warrant or probable cause justifying

the same.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT THREE
[18 U.S.C. §242]

9. On or about July 30, 2024, at approximately 7:00 p.m., within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 2 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 2's cell phone under the auspices of confirming Confidential Victim 2's insurance coverage, searched through Confidential Victim 2's cell phone contents without a warrant or probable cause justifying the same.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT FOUR
[18 U.S.C. §242]

10. Paragraphs 1-4 are incorporated here.

11. On or about September 12, 2023, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 3 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 3's cell phone following his arrest of Confidential Victim 3, searched through Confidential Victim 3's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 3's cell phone which depicted Confidential Victim

3 in a state of nudity with his personal cell phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT FIVE
[18 U.S.C. §242]

12. Paragraphs 1-4 are incorporated here.

13. On or about October 26, 2023, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 4 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 4's cell phone under the auspices of confirming Confidential Victim 4's insurance coverage, searched through Confidential Victim 4's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 4's cell phone which depicted Confidential Victim 4 in a state of nudity with his personal cell phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT SIX
[18 U.S.C. §242]

14. Paragraphs 1-4 are incorporated here.

15. On or about December 30, 2023, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 5 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws

of the United States. In so doing, the defendant took possession of Confidential Victim 5's cell phone under the auspices of confirming Confidential Victim 5's insurance coverage, searched through Confidential Victim 5's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 5's cell phone which depicted Confidential Victim 5 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT SEVEN
[18 U.S.C. §242]

16. Paragraphs 1-4 are incorporated here.

17. On or about December 31, 2023, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 6 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 6's cell phone under the auspices of confirming Confidential Victim 6's insurance coverage, searched through Confidential Victim 6's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 6's cell phone which depicted a Confidential Person in a state of nudity with his personal cell phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT EIGHT
[18 U.S.C. §242]

18. Paragraphs 1-4 are incorporated here.

19. On or about April 6, 2024, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 7 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 7's cell phone under the auspices of confirming Confidential Victim 7's identification, searched through Confidential Victim 7's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 7's cell phone which depicted Confidential Victim 7 in a state of nudity with his personal cell phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT NINE
[18 U.S.C. §242]

20. Paragraphs 1-4 are incorporated here.

21. On or about April 27, 2024, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

while acting under color of law, willfully deprived Confidential Victim 8 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 8's cell phone following his arrest of Confidential Victim 8, searched through Confidential Victim 8's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of an image on Confidential Victim 8's cell phone which depicted Confidential Victim 8 in a state of nudity with his personal cell phone. That image was found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT TEN
[18 U.S.C. §242]

22. Paragraphs 1-4 are incorporated here.

23. On or about May 16, 2024, within the Eastern District of Missouri, the defendant,

DAVID MCKNIGHT,

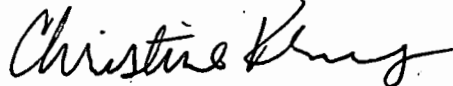
while acting under color of law, willfully deprived Confidential Victim 9 of the right to be free from unreasonable search and seizure, a right secured and protected by the Constitution and laws of the United States. In so doing, the defendant took possession of Confidential Victim 9's cell phone under the auspices of confirming Confidential Victim 9's insurance coverage, searched through Confidential Victim 9's cell phone contents without a warrant or probable cause justifying the same, and then took a photograph of one or more images on Confidential Victim 9's cell phone which depicted Confidential Victim 9 in a state of nudity with his personal cell phone. Those images were found on the defendant's cell phone.

In violation of and punishable under Title 18, United States Code, Section 242.

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney



CHRISTINE H. KRUG #42586MO
Assistant United States Attorney